



**PACIFIC FOREST TRUST**  
Private Forests. Public Treasures.

California Energy Commission

**DOCKETED**

**12-EPIC-01**

**TN 72878**

**MAR 28 2014**

California Energy Commission  
ATTN: Lorraine Gonzalez  
Dockets Office, MS-4  
Re: Docket No. 12-EPIC-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

Submitted electronically to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov) and  
[Lorraine.Gonzalez@energy.ca.gov](mailto:Lorraine.Gonzalez@energy.ca.gov).

March 28<sup>th</sup> 2014

**RE: EPIC Second Investment Plan**

Dear Lorraine:

The Pacific Forest Trust (PFT) welcomes to opportunity to comment on the working draft of the proposed initiatives and strategic objectives for the 2015 – 17 Electric Program Investment Charge (EPIC) Program – Second Triennial Investment Plan (“draft IP”). Our comments are limited to proposed initiatives that relate to forest biomass energy. In general, PFT appreciates the draft IP’s consideration of the need for greater research into the environmental impact of forest biomass energy.

However, PFT recommends that the draft IP be revised to include more specific language from the 2012 – 2014 EPIC Investment Plan that more clearly calls for ensuring the environmental sustainability of forest biomass energy. Not only will this language more fully realize the goal of the draft IP to address environmental barriers to forest biomass development, but it will also assist in the implementation of draft initiative S13.1. It may be difficult to fully realize the potential of draft initiative S13.1 unless research and development is more specifically directed toward environmental sustainability and potential mitigation measures for forest biomass energy.

*Initiative S3.1*

Draft IP initiative S3.1 seeks to fund research and development in innovations to improve sustainable bioenergy in California. In general, this inclusion of this initiative is welcome.

PFT notes that some of the language from the related initiative in the 2012 – 2014 EPIC Investment Plan was not carried over to this draft initiative. For example, the following research goal is specifically identified in the 2012 – 2014 IP:

“Advance research on sustainability standards for harvesting biomass in forestry and agricultural settings to ensure that future bioenergy development is environmentally sustainable”

This bullet point appears to have been dropped in the draft IP. The following paragraph now appears in the draft IP without mention of the need to ensure environmental sustainability of forest biomass:

“Sustainable Biomass Harvesting, Processing, and Handling Systems: Through this initiative, research will investigate technologies and approaches to reduce the cost and environmental impacts of collecting and transporting biomass feedstocks over greater distances, and increase the technical and economical availability of biomass feedstock throughout the state. Research will be conducted to develop tools and techniques to evaluate environmental and economic impacts of proposed technology solutions.”

Reducing the costs and environmental impacts of forest biomass energy is welcome, but this is not equivalent to the language that sought to “ensure environmental sustainability” in the 2012 – 2014 IP. Likewise, increasing the technical availability of feedstock and developing tools to evaluate environmental impacts are also welcome, but they are also not equivalent to ensuring environmental sustainability.

PFT recommends that the revised draft of the 2015-2017 IP include the language from the 2012 – 2014 IP that expressly calls for research that helps to ensure the environmental sustainability of biomass energy. Inserting the above quoted bullet point from the 2012 – 2014 IP in the description of draft IP initiative S3.1 would accomplish this.

#### *Initiative S5.2*

Draft IP initiative S5.2 is welcome. PFT supports the identification of barriers to forest biomass development that specifically include a lack of proven mitigation measures and strategies for ecosystem conservation (p. 58). PFT recommends highlighting forest biomass as a renewable energy technology that requires environmental mitigation research in the “Purpose” section (p. 57 – 58) of the initiative’s description in the draft IP.

#### *Initiative S13.1*

PFT believes that funding for sustainability research on forest biomass under draft initiatives S3.1 and S5.2 is necessary for successful implementation of draft

initiative S13.1. This initiative seeks to fund “demonstration projects [that] will use technologies and strategies sized for environmentally and economically sustainable utilization of locally available biomass resources...” (p. 97).

As mentioned in the background to S3.1 and S5.2, further study is required to ensure the environmental sustainability of forest biomass feedstock harvesting and appropriate mitigation strategies. Therefore, PFT recommends that forest biomass energy be given greater attention in the description of initiatives S3.1 and S5.2, and that the nexus between that research and the successful implementation of S13.1 be acknowledged by the draft IP.

Thank you again for the opportunity to comment on the draft EPIC IP for 2015 – 2017. Please feel free to contact me if you have any questions regarding this letter or PFT’s recommendations. I can be reached at (415) 561-0700 x39 or by email at [pdoherty@pacificforest.org](mailto:pdoherty@pacificforest.org).

Sincerely,

Patrick Doherty  
Senior Policy Associate  
Pacific Forest Trust